

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

Abdel Torres Rodriguez
Maribel Gorbea Diaz
Debtor

CASE NO. 09-07086 SEK

CHAPTER 13

OBJECTION TO CONFIRMATION OF PLAN

TO THE HONORABLE COURT:

COMES NOW, creditor Empresas Berríos Financiera represented by the undersigned attorney, and very respectfully ALLEGES, STATES and PRAYS:

1. On December 21 2009 Debtor filed a proposed Chapter 13 Payment Plan.
2. Empresas Berríos Financiera is a secured creditor in the present case. (*See Proof of Claim #6-1*)
3. That Debtor's Payment Plan does not include any type of treatment for the appearing creditor.
4. Empresas Berríos Financiera objects to the confirmation of such Plan because the Debtor failed to provide treatment for the appearing creditor's claim.
5. 11 USC §1325 (5)(A) states that the court shall confirm a plan with respect to each allowed secured claim if the holder of such claim has accepted the plan.

WHEREFORE, it is respectfully requested from this Honorable Court to deny the confirmation of Debtor's Payment Plan.

I HEREBY CERTIFY: that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Debtor's Attorney Edgar Brito Borgen, Chapter 13 Trustee Jose Ramon Carrion Morales Esq. US Trustee Monsita Lecaroz Arribas, Esq. and to all those who in this case have registered for receipt of notice by electronic mail.

RESPECTFULLY SUBMITTED:

In Caguas, Puerto Rico this 13 day of September, 2010.

Ramos & Bagué Law Office
PO Box 306
Caguas, PR 00726-0306
Tel. (787) 502-8037
Fax (787) 653-6003
ramosbague@gmail.com

/s/Isayra Bague Diaz, Esq.
USDC 225114